

QUILL & ARROW LLP

Kevin Y. Jacobson, Esq. (SBN 320532)

kjacobson@quillararrowlaw.com

Matthew Treybig, Esq. (SBN 336797)

mtreybig@quillararrowlaw.com

10880 Wilshire Boulevard, Suite 1600

Los Angeles, CA 90024

Telephone: (310) 933-4271

Facsimile: (310) 889-0645

Attorneys for Plaintiff,

SAUL PENA TERRES

LEWIS BRISBOIS BISGAARD & SMITH LLP

H.Paul Efstratis (SBN 242373)

Paul.Efstratis@lewisbrisbois.com

Jad I. Doudar (SBN 332499)

Jad.Doudar@lewisbrisbois.com

45 Fremont Street, Suite 3000

San Francisco, California 94105

Attorneys for Defendant,

FORD MOTOR COMPANY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SAUL PENA TERRES, an individual,
Plaintiff,

vs.

FORD MOTOR COMPANY, a
Delaware Corporation, and DOES 1
through 10, inclusive,

Defendants.

Case No.: [2:24-cv-02489-JAM-AC](#)

Assigned Judge: John A. Mendez

**STIPULATION AND ORDER OF
DISMISSAL**

STIPULATION

Pursuant to Federal Rule of Civil Procedure 41(a)(1), IT IS HEREBY STIPULATED, by and between Plaintiff, SAUL PENA TERRES, and Defendant, FORD MOTOR COMPANY, (hereafter “the Parties”), by and through their respective counsel of record, that the entire above-captioned action be dismissed with prejudice in accordance with the terms of the written settlement agreement entered into between the Parties.

Upon order of the Court and upon such terms and conditions as the Court deems proper, the Parties respectfully request that this action be dismissed with prejudice and that the Court continue to retain jurisdiction over the terms of the Parties’ settlement agreement.

Dated: February 13, 2025,

QUILL & ARROW, LLP

By



Kevin Y. Jacobson, Esq.
Matthew Treybig, Esq.
Attorneys for Plaintiff,
SAUL PENA TERRES

Dated: February 13, 2025,

**LEWIS BRISBOIS BISGAARD &
SMITH LLP**

By /s/ H.Paul Efstratis

H.Paul Efstratis, Esq.
Jad I. Doudar, Esq.
Attorney for Defendant,
FORD MOTOR COMPANY

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I hereby certify that the content of this document is acceptable to H.Paul Efstratis, Esq. counsel for FORD MOTOR COMPANY, and that I have obtained authorization to affix his electronic signature to this document.

QUILL & ARROW, LLP

/s/ Matthew Treybig
Kevin Y. Jacobson, Esq.
Matthew Treybig, Esq.
Attorneys for Plaintiff,
SAUL PENA TERRES

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SAUL PENA TERRES, an individual,

Plaintiff,

vs.

FORD MOTOR COMPANY, a
Delaware Corporation,

Defendant,

Case No.: 2:24-cv-02489-JAM-AC

Assigned Judge: John A. Mendez

ORDER OF DISMISSAL

1 Based on the stipulation of the parties, and good cause appearing, the entire
2 action, including all claims and counterclaims stated herein against all parties, is
3 hereby **DISMISSED with prejudice.**

4 **IT IS SO ORDERED.**

5
6 Dated: February 18, 2025

/s/ John A. Mendez

7 THE HONORABLE JOHN A. MENDEZ
8 SENIOR UNITED STATES DISTRICT JUDGE
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28